

Statement of Basis North American Lighting, Inc.  
(Automotive Parts & Surface Coating Processes)

Major Source of Volatile Organic Compounds & Hazardous Air  
Pollutant Emissions

Introduction

On September 06, 2013, North American Lighting, Inc., (NAL), submitted a Title V major source permit renewal application for the manufacture and surface coating of automotive parts (SIC # 3647). NAL is located in Muscle Shoals, Alabama.

Changes from the previous Title V issuance include adding several units that have been issued Air Permits since the last renewal. NAL is a minor source of CO<sub>2</sub>e as reported in their application; although, this does not require any changes to the proposed Title V permit.

Operation

The facility manufactures plastic parts involving automobile lighting equipment. These facility operations consist of 43 injection molding machines (13 more to be added next two years) and surface coating of some of these parts. NAL had constructed three coating lines in their original Title V permit.

X001: Smoke Topcoat Line EU1  
X003: HMSL Decorative Paint Line EU3  
X004: L42A, 4B Line EU4A

Since their original Title V application, the following units have been constructed or are being installed presently.

X005: BMC Molding  
X006: BMC Basecoat1/ BMC Basecoat2/ PES Basecoat/ Bazel Basecoat  
X007: Hardcoat1/ Hardcoat2  
X008: Bazel Sidepaint1/ Bazel Sidepaint2A/ Bazel Sidepaint2B  
X009: Anti-Haze1/ Anti-Haze2  
X011: Deck 5 Booth.

Regulations

The potential VOC emissions exceed the 250 TPY threshold for PSD purposes. The company does not have the potential to exceed the 250 TPY threshold for any other criteria pollutant. NAL has requested a 200 TPY Synthetic Minor limit to restrict their VOC emissions below this threshold. This limit has already been incorporated into its Air Permits and will be incorporated into the Title V upon renewal. This source will remain a minor source for PSD applicability.

Potential emission of VOCs exceed the threshold of 100 tons per year. Therefore, NAL is considered a major source for Title V purposes.

The potential HAP emissions from the coating operation are also in such quantities as to exceed the Title III and Title V major source thresholds. The HAP emission thresholds for a major source are 10 tons for a single HAP and 25 tons for a combination of any HAPs.

The MACT (Maximum Achievable Control Technology) found in 40 CFR Part 63, Subpart PPPP for the Surface Coating of Plastic Parts applies to automotive lighting equipment manufacturing. NAL is classified as a “new” source for MACT applicability. This regulation applies facility-wide (within subcategories), and NAL complies with the standard by averaging their coating formulation calculations from all their lines. This is done on a rolling 12 month average for the facility. The limit for the “Automotive Lamp Coating” is 0.26 #HAPs/#Solids.

The BMC Molding machines are subject to the National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Hazardous Air Pollutant (HAP) emissions from Reinforced Plastic Composites Production (WWWW) as a “New Source”. NAL meets the work practice standards for injection molding to include 40 CFR Part §63.5805 Table 4 (1) among other requirements.

An existing Emergency Generator has been incorporated into the Title V permit. This unit is subject to the NESHAPs for Hazardous Air Pollutant (HAP) Emissions from Stationary Reciprocating Internal Combustion Engines (ZZZZ) as an “New Source” and the NSPS for Stationary Spark Ignition Internal Combustion Engines (JJJJ) as an “New Source”.

There are no other New Source Performance Standards (NSPS) for this facility or CTGs that are applicable to this facility. PM emissions are expected to be minimal. Therefore, opacity and process weight regulations are not expected to be exceeded.

No other criteria pollutants are emitted in sufficient quantities, actually or potentially, to exceed the major source threshold of 100 tons per year.

The following is a list of all of the facility's sources (individual emissions units) which will be part of the facility's Title V Major Source Operating Permit:

<b>Permit Unit No.</b>	<b>Description of Unit</b>
<b>001</b>	<b>Smoke Topcoat Line EU1</b>
<b>003</b>	<b>HMSL Decorative Paint Line</b>
<b>004</b>	<b>L42A, 4B Line EU4A</b>
<b>005</b>	<b>BMC Molding</b>
<b>006</b>	<b>BMC Basecoat 1/ BMC Basecoat 2 / PES Basecoat / Bazel Basecoat</b>
<b>007</b>	<b>Hardcoat 1/ Hardcoat 2</b>
<b>008</b>	<b>Bazel Sidepaint 1/ Bazel Sidepaint 2A/ Bazel Sidepaint 2B</b>
<b>009</b>	<b>Anti-Haze 1/ Anti-Haze 2</b>
<b>011</b>	<b>Deck 5 Booth</b>

#### **Monitoring of Emissions**

NAL will maintain records of monthly coating usage and coating analysis. These will be submitted quarterly.

The monitoring for the coating process is the same as similar Title V sources and expected to be sufficient. The recordkeeping and monitoring requirements set forth in the MACT regulation PPPP have been incorporated into the provisos. The MACT requires semiannual reporting.

Compliance Assurance Monitoring (CAM) regulations are not applicable for the units within this Title V permit because these units are subject to MACT regulations that were proposed after November 15, 1990. CAM is not applicable for the other units at this facility because potential uncontrolled emissions of criteria pollutants do not exceed 100 tons per year on any one unit with control device(s).

#### **Changes From the Previously issued Title V Permit to the Proposed Title V Permit**

On Permit Unit 001, in Sections 1.3, 2.2, the requirements for a 200 TPY Synthetic Minor limit were incorporated into this permit.

On Permit Unit 002, in Sections 1.3, 2.2, the requirements for a 200 TPY Synthetic Minor limit were incorporated into this permit.

On Permit Unit 003, in Sections 1.3, 2.2, the requirements for a 200 TPY Synthetic Minor limit were incorporated into this permit.

On Permit Unit 005, BMC Molding was added as a permitted source unit.

On Permit Unit 006, BMC Basecoat1/ BMC Basecoat2/ PES Basecoat/ Bazel Basecoat were added as permitted source units.

On Permit Unit 007, Hardcoat1/ Hardcoat2 were added as a permitted source units.

On Permit Unit 008, Bazel Sidepaint1/ Bazel Sidepaint2A/ Bazel Sidepaint2B were added as permitted source units.

On Permit Unit 009, Anti-Haze1/ Anti-Haze2 were added as permitted source units.

On Permit Unit 011, Deck 5 Booth was added as a permitted source unit.

On Permit Unit 019, an existing Emergency Generator has been incorporated into the Title V permit.

#### **Permitting Fees**

Title V major sources are subject to operating permit fees which charge the facility a yearly amount based on the actual emission rate of pollutants for the previous year.

**Affected States Notification**

All states bordering Alabama are notified automatically when the public notice is issued.

**Recommendations**

I recommend that the attached permit be issued to NAL, pending EPA and public review of the proposed permit.

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Kevin Fulmer  
Chemical Branch  
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